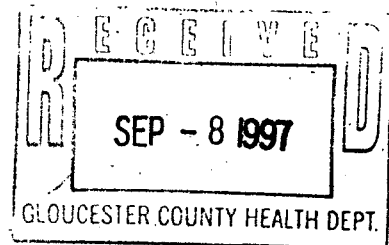




# State of New Jersey

Department of Environmental Protection

Christine Todd Whitman  
Governor



Robert C. Shinn, Jr.  
Commissioner

SEP 03 1997

Scott Smith  
Geotech Environmental, Inc.  
125 North Route 73  
Maple Shade, NJ 08052

Re: Remcor, Inc.  
Monroe Twp., Gloucester County  
ISRA Case #94409  
Remedial Investigation Workplan dated May 28, 1997 and addenda dated June 9, 1997, June 25, 1997, June 30, 1997, July 8, 1997 and July 28, 1997

Dear Mr. Smith:

Pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (NJDEP) by the Industrial Site Recovery Act (ISRA) and delegated to the Chief of the Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA) pursuant to N.J.S.A. 13:1B-4, the referenced Remedial Investigation Workplan (RIW) is hereby approved as conditioned below:

## I. Soil Conditions

### Underground Storage Tanks- UST2, UST3 and UST4

1. The proposal to abandon the three underground storage tanks (UST) in place is acceptable with the following conditions:
  - a. Remcor, Inc. shall include the areas of boring SB-1, SB-8 and B-17 in the proposed excavation.
  - b. The proposal to collect 12 post excavation base samples and 18 post excavation sidewall samples is not required. Specifically, the proposed post excavation side wall surface samples are not required unless a discharge to the surface soils in this area has occurred. Remcor, Inc. shall collect post excavation soil samples at a frequency pursuant to the Technical Requirements for Site Remediation 7:26E (TRSR).
  - c. In addition to the sample frequency outlined in the TRSR, Remcor, Inc. shall collect additional post excavation soil samples at sample locations B-13, B-14 and in between the locations of UST 2 and UST 3. Because the underground storage tanks were used to contain waste oils, Remcor, Inc. shall analyze these samples for total petroleum hydrocarbons (TPHC), priority pollutant metals, polychlorinated biphenyls (PCB) and volatile organic compounds with a forward library search (VO+15). In addition, due to elevated base neutral organic compound method detection limits for sample B-17-1, Remcor, Inc. shall collect



a post excavation soil sample in this area and analyze the sample for TPHC and base neutral organic compounds with a forward library search (BN+15).

d. Remcor, Inc. shall collect soil samples through the center of each UST. Since the USTs formerly contained waste oil, Remcor, Inc. shall analyze the soil samples for VO+15, base neutral organic compounds with a forward library search (BN+15), priority pollutant metals (PPM) and polychlorinated biphenyls (PCB). The samples to be analyzed for BN+15, PPM, and PCBs shall be collected at 0-6" below the base of the USTs. The soil samples for VO+15 shall be collected at a depth pursuant to the TRSR.

2. This approved Remedial Investigation Workplan also satisfies the requirement for Closure Plan approval for the underground storage tank(s) (UST) at Remcor, Inc. that are regulated by the UST Regulations (N.J.A.C. 7:14B). Enclosed is an executed UST Closure Plan approval which shall be presented, prior to Closure Plan implementation, to the Local Construction Official so that the appropriate permits can be issued by the municipality.

Please be advised that, as of April 25, 1992, no services shall be performed on regulated underground storage tanks for the purposes of complying with New Jersey's Underground Storage of Hazardous Substances Act (UST Regulations) unless the services are performed by a certified individual. This is required pursuant to the Underground Storage Tank Services Certification Law, N.J.S.A. 58:10A-24. This law requires firms engaged in providing such services be certified as well. Because the underground storage tanks addressed in this closure approval are subject not only to the provisions of ISRA but also to closure requirements of the UST Regulations, all services performed to close these tanks pursuant to this Closure Plan Approval shall be conducted by a certified individual and firm.

Please be advised that since Advanced Remedial Technologies, Inc. (ARTI) a firm which prepared a portion of the Closure Plan, application is not a certified firm, ARTI may not perform the proposed abandonment in place of the three underground storage tanks.

An Underground Storage Tank Facility Questionnaire will be required after the closure of an underground storage tank regulated by N.J.A.C. 7:14B. The signed Questionnaire and the information requested on the attached "Closure Notice" shall be submitted within 7 calendar days after the completion of the tank closure (physical tank removal or abandonment) to the Bureau of Federal Case Management-Registration & Billing unit.

## II Ground Water Conditions

1. The proposed monitoring well location is acceptable. Remcor, Inc. shall collect a sample from the proposed monitoring well and analyze the sample for VO+15, BN+15 and PPM, DO and pH.

### III Site Inspection

1. Be advised that a site inspection by the NJDEP is required. Furthermore, be advised that the site visit will include a reinspection of the interior of the building. Therefore, Remcor, Inc. shall notify the Case Manager at least 10 days prior to the implementation of any field activities so that the site inspection can be conducted at the same time as the proposed remedial activities.

### IV General Requirements

1. Remcor, Inc. shall perform all actions as outlined in the RIW, and conditioned in this approval. If any change in methods outlined in the RIW is necessary, Remcor, Inc. shall inform BEECRA in writing prior to implementation.

2. Remcor, Inc. shall collect all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual".

3. Remcor, Inc. shall submit a revised remedial action schedule within 15 calendar days of receipt of this letter.

4. All reports shall follow the requirements of the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. Technically and administratively incomplete submissions, not prepared pursuant to N.J.A.C. 7:26E, may be rejected.

5. If contamination is determined to exist above a level found acceptable by NJDEP, Remcor, Inc. may prepare and submit either a Remedial Investigation Workplan or a Remedial Action Workplan pursuant to N.J.A.C. 7:26E. However, in accordance with N.J.S.A. 13:1K-9, Remcor, Inc. may remediate the site without prior submission or approval from the NJDEP, except in cases involving a remedial action of ground water or surface water, or for the closure of an underground storage tank subject to N.J.S.A. 58:10A. If contamination exists on-site, but has not been fully delineated pursuant to N.J.A.C. 7:26E-4, then such delineation shall be completed as a Remedial Investigation which meets the criteria of N.J.A.C. 7:26E.

6. Any remedial action performed, or proposed in a Remedial Action Workplan, shall be in accordance with N.J.S.A. 58:10B-12.

7. Any proposal to leave contaminant concentrations on-site exceeding the NJDEP's current residential cleanup criteria, shall be in accordance with N.J.S.A. 13:1K-9, including whether the cost difference between implementing the residential cleanup criteria and the nonresidential criteria exceeds ten percent of the cost to implement the non-residential cleanup criteria, and proof of acceptance of the non-residential cleanup criteria by the current property owner.

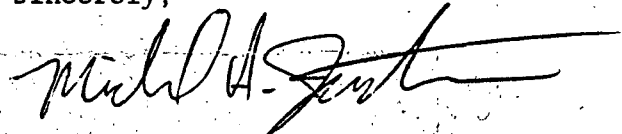
8. On February 22, 1994, the New Jersey Department of Environmental Protection (NJDEP) promulgated the ISRA Fee Rule amendments at 26 N.J.R. 1142, which were proposed on April 5, 1993 at 25 N.J.R. 1375. Pursuant to the fee rule amendments, the NJDEP will bill an owner or operator according to the direct

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billing formula at N.J.A.C. 7:26B-1.10(f)2. At this time, the NJDEP intends to process bills on a semi-annual basis. The NJDEP encourages responsible parties to use the "Technical Requirements for Site Remediation" (N.J.A.C. 7:26E) as well as any other NJDEP guidance documents to assist in remediation activities and thereby minimize NJDEP review time. The complexity of the environmental contamination at the site and the quality of the workplans and reports submitted to the NJDEP will dictate the oversight costs to the regulated community.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 292-0130.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Justiniano", with a long horizontal flourish extending to the right.

Michael A. Justiniano, Supervisor  
Bureau of Environmental Evaluation,  
Cleanup and Responsibility Assessment

c: M.J. Caparrelli, Property Owner  
Lois Ganary  
Health Department  
R. Yarsinsky, BSCM